

THE STATE OF SOUTH CAROLINA
Public Service Commission

FORTY LOVE POINT HOMEOWNERS' ASSOCIATION

Docket no. 2019-290-WS
Application of Blue Granite Water Company for Approval to Adjust the Rate
Schedule and Increase Rates

PETITION TO INTERVENE AS A PARTY OF RECORD

FORTY LOVE POINT HOMEOWNERS' ASSOCIATION, located near Chapin, South Carolina, moves to join this action as a PARTY OF RECORD entitled to receive all motions, briefs, all correspondence, and all offers of settlement among the parties.

The reasons for this motion are as follows:

1. **PROPOSED CHANGES TO THE TARIFF WOULD MAKE WATER AND SEWER SERVICES UNREASONABLY EXPENSIVE AND UNAFFORDABLE.** The proposed rate increases and added expenses would make water and sewer collection charges unaffordable in the Forty Love Point neighborhood. The requested changes represent a rate increase of more than 50 percent. Our water and sewer rates are already demonstrably higher than in adjacent locations which receive water and sewer services from public entities.
2. **CERTAIN PROVISIONS AFFECT FORTY LOVE POINT MORE THAN OTHER CUSTOMERS.** The pass-through, automatic rate adjustment mechanism requested in paragraph 19 of the application would affect Forty Love Point residents more than others because we receive water purchased from the City of Columbia. Also, since most in our neighborhood have LETTS tanks, each customer our neighborhood would be directly affected by the request in paragraph 24, which seeks the actual cost of servicing individual LETTS tanks. Currently there is a limit of \$150 on the amount Blue Granite could charge.
3. Forty Love Point seeks to be an active part of any settlement negotiations among any of the parties.

Respectfully submitted by,

/s/Laura P. Valtorta
Laura P. Valtorta, Esquire
Attorney at Law
903 Calhoun Street
Columbia, SC 29201
(803) 771-0828
laurapv@aol.com

October 15, 2019